

REMARKS/ARGUMENTS

Claims 1-20 are pending in the application.

Claims 1-5, 7-15, and 17-20 are rejected under 35 USC §102(e) as being anticipated by Witkowski (U.S. Pub. No. 2004/0030766).

Claims 6 and 16 are rejected under 35 USC §103(a) as being unpatentable over Witkowski as applied to claims 1, 4, 11 and 14 above, further in view of Thompson et al. (U.S. Pub. No. 2003/0229522).

The independent claims 1, 7, 11, and 17 have been amended to further distinguish the art of record. Claim 1 is representative. Claim 1 has been amended to substantively recite in part channel controllers having a “file access processing section to translate a received file access request to a corresponding block access request.” See the specification as originally filed on page 14, lines 1-5, and page 26, lines 7-26. No new matter has been added.

Claim 1 has been further amended to substantively recite in part that either the channel controllers or the disk controller selectively performs “copying data from a source logical unit (LU) to a destination LU on an LU basis; and copying data from the source LU to the destination LU on a file basis,” where copying on an LU basis includes “copying data from the source LU to the destination LU based on difference data indicative of differences between data stored on the source LU and data stored on the destination LU” and copying on a file basis includes “copying a subject file and metadata associated with the subject file to the destination LU.” See the specification as originally filed on page 39, line 28 to page 40, line 18, and page 41, line 27 to page 42, line 18. No new matter has been added.

Witkowski discloses an FC controller at paragraphs [0076 & 0077]. Witkowski clearly teaches (and as one of ordinary skill would readily realize) that FC controllers are block I/O devices, namely, provides a SCSI over FC function that allows SCSI formatted block storage access. *Paragraph [0076]*. Therefore Witkowski does not teach “a plurality of channel controllers ... receiving requests to input and output data in files as units,” as originally recited, the independent claims. Thus, for at least this reason, the Section 102 rejection of the claims is believed to be overcome.

Nevertheless, the claims have been amended. With respect to the amended claims, Witkowski's FC controller does not process file access requests because his controller provides for SCSI access (which are block-based accesses) over an FC channel (via the FC controller). Witkowski therefore does not show or even suggest the recited "file access processing section to translate a received file access request to a corresponding block access request."

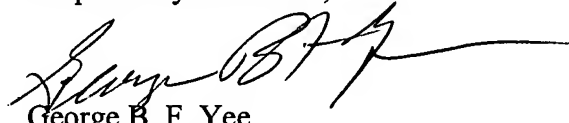
Witkowski further discloses processing of a storage command in Fig. 24 and in paragraph [0169]. As best understood, Witkowski discloses block-based processing. Witkowski does not disclose filed-base copying. Witkowski therefore does not teach or suggest "selectively performing copying data from a source logical unit (LU) to a destination LU on an LU basis, and copying data from the source LU to the destination LU on a file basis."

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-324-6352 (direct line).

Respectfully submitted,



George B. F. Yee
Reg. No. 37,478

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 650-326-2400
Fax: 415-576-0300
GBFY:gjs
60764883 v1